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12 *Attorneys for Defendants/Counterclaimant*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**  
15

16 LAS VEGAS SUN, INC., a Nevada  
17 corporation,

18 Plaintiff,

19 v.

20 SHELTON ADELSON, an individual and as  
the alter ego of News+Media Capital Group  
21 LLC and as the alter ego of Las Vegas Review  
Journal, Inc.; PATRICK DUMONT, an  
22 individual; NEWS+MEDIA CAPITAL  
GROUP LLC, a Delaware limited liability  
23 company; LAS VEGAS REVIEW-JOURNAL,  
INC., a Delaware corporation; and DOES, I-X,  
24 inclusive,

25 Defendants.  
26  
27  
28

Case No. 2:19-cv-01667-GMN-VCF

**JOINT STIPULATION FOR ENTRY OF  
SECOND AMENDED DISCOVERY PLAN  
AND SCHEDULING ORDER, AND  
EXTENSIONS OF TIME FOR BRIEFING  
(FIRST REQUESTS)**

1 LAS VEGAS REVIEW-JOURNAL, INC., a  
2 Delaware corporation,

3 Counterclaimant,

4 v.

5 LAS VEGAS SUN, INC., a Nevada  
6 corporation; BRIAN GREENSPUN, an  
7 individual and as the alter ego of Las Vegas  
8 Sun, Inc.; GREENSPUN MEDIA GROUP,  
9 LLC, a Nevada limited liability company, as  
10 the alter ego of Las Vegas Sun, Inc.,

11 Counterclaim-  
12 Defendants.

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN  
2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through  
3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,  
4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants  
5 NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, and PATRICK DUMONT  
6 (collectively the “Review-Journal”), by and through their counsel of record, Kemp Jones, LLP,  
7 and Jenner & Block LLP, hereby stipulate and agree as follows:

8 1. All upcoming case deadlines in the First Amended Scheduling Order (ECF No.  
9 393) are hereby extended by 45 days. (This does not impact Judge Pro’s order dated October 4,  
10 2021 (ECF No. 484).) The Parties jointly request that the Court enter the attached Order  
11 implementing the modified schedule. **Exhibit A.**

12 2. The deposition of Ric Anderson (noticed as an in-person deposition for January 3,  
13 2022) will be continued to January 12, 2022 and will take place via Zoom or comparable remote  
14 technology.

15 3. The Parties will work in good faith to stipulate to a protocol for remote depositions  
16 taken by Zoom or comparable technology. The Sun is not committing to remote depositions for  
17 all depositions which the Sun notices. The Sun will not object to remote depositions for  
18 depositions noticed by the Review-Journal.

19 4. All depositions that are scheduled for January (other than Ric Anderson) will be  
20 continued and rescheduled by the Parties. This includes the individual depositions of Keith Moyer,  
21 Elizabeth Cain, Brian Greenspun, and Craig Moon, as well as the Rule 30(b)(6) deposition of the  
22 Sun.

23 5. When rescheduling depositions, the Parties will work in good faith to respect the  
24 order of depositions that were previously scheduled.

25 6. The Rule 30(b)(6) deposition of the Sun will be rescheduled to February 15 and 16,  
26 2022, and the individual deposition of Bob Cauthorn (currently set for February 2, 2022) will be  
27 rescheduled. The Sun will identify its Rule 30(b)(6) witnesses and the topics they will be covering  
28 no later than January 17, 2022.

1           7.       The Review-Journal has withdrawn (without prejudice) its motion for protective  
2 order regarding the deposition of Keith Moyer (and has notified Judge Pro that the Parties have  
3 agreed to vacate the hearing on that motion previously scheduled for January 4). ECF No. 547.

4           8.       The Parties agree to the following briefing extensions:

5           a.       The Review-Journal's opposition to the Sun's motion to compel Patrick  
6 Dumont's deposition preparation materials (ECF No. 528), originally due  
7 December 30, 2021, will be due January 10, 2022. The Sun's reply will be  
8 due January 25, 2022.

9           b.       The Review-Journal's opposition to the Sun's motion to compel relating to  
10 RFP 523 (ECF No. 534), originally due January 4, 2022, will be due January  
11 11, 2022. The Sun's reply will be due January 18, 2022.

12           c.       The Review-Journal's opposition to the Sun's motion for leave to amend  
13 and supplement the complaint (ECF No. 537), originally due January 6,  
14 2022, will be due January 20, 2022. The Sun's reply will be due February  
15 10, 2022.

16           d.       Corresponding extensions apply to any sealing briefs related to these  
17 motions if needed.

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22       ///

26       ///

1 DATED this 3rd day of January 2022.

DATED this 3rd day of January 2022.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP KEMP JONES LLP

3  
4 By: /s/ Kristen L. Martini

By: /s/ Michael J. Gayan

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*Attorneys for Defendants/  
Counterclaimant*

21 *Attorneys for Plaintiff/Counterdefendants*

22 **IT IS SO ORDERED:**

23 Dated this \_\_\_\_ day of \_\_\_\_\_, 2022.

24 \_\_\_\_\_  
25 SPECIAL MASTER PHILIP M. PRO  
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27  
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**PROOF OF SERVICE**

I hereby certify that on the 3rd day of January, 2022, I served a true and correct copy of the foregoing **JOINT STIPULATION FOR ENTRY OF A SECOND AMENDED SCHEDULING ORDER, AND EXTENSIONS OF TIME FOR BRIEFING (FIRST REQUESTS)** via the United States District Court's CM/ECF electronic filing system to all parties on the e-service list.

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Marla Hudgens, Bar No. 11098  
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*Attorneys for Plaintiff/Counterclaim Defendants*

/s/ Mona Kaveh

An employee of Kemp Jones, LLP

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**INDEX OF EXHIBITS**

<b>Exhibit No.</b>	<b>Document</b>
A	[Proposed] Second Amended Discovery Plan and Scheduling Order

# **EXHIBIT A**

[Proposed] Second Amended Discovery Plan and Scheduling Order



**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAS VEGAS SUN, INC., a Nevada  
corporation,

Plaintiff,

v.

SHELDON ADELSON, an individual and as  
the alter ego of News+Media Capital Group  
LLC and as the alter ego of Las Vegas Review  
Journal, Inc.; PATRICK DUMONT, an  
individual; NEWS+MEDIA CAPITAL  
GROUP LLC, a Delaware limited liability  
company; LAS VEGAS REVIEW-JOURNAL,  
INC., a Delaware corporation; and DOES, I-X,  
inclusive,

Defendants.

Case No. 2:19-CV-01667-GMN-VCF

**~~PROPOSED~~ SECOND AMENDED  
DISCOVERY PLAN AND SCHEDULING  
ORDER**

LAS VEGAS REVIEW-JOURNAL, INC., a  
Delaware corporation,

Counterclaimant,

v.

LAS VEGAS SUN, INC. a Nevada corporation;  
BRIAN GREENSPUN, an individual and as the  
alter ego of Las Vegas Sun, Inc.; GREENSPUN  
MEDIA GROUP, LLC, a Nevada limited  
liability company, as the alter ego of Las Vegas  
Sun, Inc.

Counterclaim Defendants.

Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN GREENSPUN and GREENSPUN MEDIA GROUP, LLC, by and through their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm, and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, and PATRICK DUMONT, by and through their counsel of record, Kemp Jones, LLP, and Jenner & Block LLP, hereby stipulate and agree as follows:

1. On May 3, 2021, after the Parties submitted a joint proposed Amended Joint Discovery Plan and Scheduling Order (ECF No. 391), and Stipulation to Correct Error in Discovery Plan and Scheduling Order (ECF No. 393), Special Master Pro entered an Order on the

Parties' stipulation. As a result of the correction, the updated case deadlines were entered as follows:

<u>Last Day to Amend Pleadings for all parties:</u>	December 23, 2021
<u>Close of Fact Discovery:</u>	April 22, 2022
<u>Close of Expert Discovery:</u>	August 23, 2022
<u>Expert Disclosures:</u>	May 23, 2022
<u>Rebuttal Expert Deadline:</u>	July 22, 2022
<u>Dispositive Motion/Pre-Hearing Briefs Deadline:</u>	September 6, 2022
<u>Pretrial Order:</u>	October 6, 2022

2. The Parties have continued with discovery, and recently started taking depositions. Several depositions have been set for January. However, on December 28, 2021, lead counsel for the Sun suffered a death in the family. This unfortunate event combined with the increase in cases due to the newest COVID variant, and travel issues resulting from heavy snowfall in Northern Nevada and increased flight cancellations, have caused the Parties to agree to continue all January depositions (with the exception of one) by 30 days, to be reset for February.

3. Accordingly, the Parties seek to continue all case deadlines by 45 days.<sup>1</sup> The Parties therefore request the following new deadlines:

<u>Close of Fact Discovery:</u>	June 7, 2022
<u>Close of Expert Discovery:</u>	October 7, 2022
<u>Expert Disclosures:</u>	July 7, 2022
<u>Rebuttal Expert Deadline:</u>	September 6, 2022
<u>Dispositive Motion/Pre-Hearing Briefs Deadline:</u>	October 21, 2022
<u>Pretrial Order:</u>	November 22, 2022

Pursuant to Local Rule 26-1(b)(5), the deadline for the joint pretrial order is 30 days after the dispositive-motion deadline. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after the Court's decision on the dispositive motions.

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<sup>1</sup> Where the 45 days fell on a weekend, the date was moved to the following Monday.

1 DATED this 3rd day of January, 2022.

DATED this 3rd day of January, 2022.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP KEMP JONES LLP

3  
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By: /s/ Michael J. Gayan

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*Defendants/Counterclaimant*

IT IS SO ORDERED:

22 Dated this 4th day of January, 2022.

  
SPECIAL MASTER PHILIP M. PRO